

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

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AMAZON.COM, INC and AMAZON DATA SERVICES, INC.,	)	Case No. 1:20cv484 (LO/TCB)
Plaintiffs,	)	
v.	)	
WDC HOLDINGS LLC d/b/a NORTHSTAR COMMERCIA PARTNERS, et al,	)	
Defendants,	)	<b>JOINT MOTION TO ATTEND MOTION HEARING VIA REMOTE MEANS AND NELSON DEFENDANTS' MOTION FOR INDEPENDENT APPEARANCE OF FOREIGN ATTORNEY</b>
800 HOYT LLC,	)	
Intervening Interpleader Plaintiff,	)	
v.	)	
BRIAN WATSON, WDC HOLDING LLC, PLW CAPITAL I, LLC.AMAZON.COM, INC, and AMAZON DATA SERVICES, INC.	)	
Interpleader Defendants.	)	

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Defendants Carleton Nelson and Cheshire Ventures, LLC (“Nelson Defendants”), Casey Kirschner (“Mr. Kirschner”) and 800 Hoyt LLC (“800 Hoyt”) (collectively, the “Moving Parties”) respectfully file this Joint Motion to Attend the Motion Hearing Via Remote Means and Nelson Defendants’ Motion for Independent Appearance of Foreign Attorney, and, in so doing, respectfully state the following:

1. The Moving Parties respectfully request that their Counsel and Mr. Kirschner be granted permission to attend the Thursday, January 6, 2022 Motion Hearing (Dkt. 468) via remote means of either telephone conference or web conference.

2. Moving Parties' primary counsel offices and Mr. Kirschner are out-of-state, and each would prefer to save the travel costs and additional attorneys' fees that would be incurred by attending the hearing in person.

3. Further, the Moving Parties request to attend the hearing by telephone or web conference in light of the novel coronavirus/COVID-19 because it will allow the Court, counsel, parties, and staff to practice reasonable social distancing in order to mitigate the impact of the emerging variants due to the travel.

4. In addition, primary counsel for the Nelson Defendants, Alex Little, has a premature newborn who recently came home from the hospital and is medically vulnerable. Traveling to attend the hearing in person during the present surge in Covid/Omicron cases would either expose his newborn to health risks or require him to quarantine away from his family.

5. No party objects to appearance of the Moving Parties by remote means.

6. Independently, the Nelson Defendants request that their *pro hac vice* admitted counsel, Alex Little, be permitted to attend the January 6, 2022 Motion Hearing without aid of local counsel.

7. Pursuant to Local Rule 83.1(D)(1)(b), local counsel is required to attend all hearings with foreign counsel admitted *pro hac vice*.

8. The Nelson Defendants' local counsel, Rachel Friedman, is presently on maternity leave. For this reason, the Nelson Defendants' respectfully request that Ms. Friedman be excused from attendance and Mr. Little be granted the limited ability to appear independently of her for the January 6, 2022 Motions Hearing only.

9. No party objects to Mr. Little's limited independent appearance for the Motions Hearing.

WHEREFORE, in the interest of economy and the reasons detailed above, the Moving Parties respectfully request that the Court permit the Moving Parties to attend the January 6, 2022 Motions Hearing via remote means. Moreover, the Nelson Defendants additionally request that counsel Alex Little be permitted to attend the January 6, 2022 Motions Hearing independent of local counsel.

Dated: December 30, 2021

**BURR & FORMAN LLP**

/s/ Rachel Friedman

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/s/ J. Alex Little

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**CASEY KIRSCHNER**

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**ATTORNEYS FOR INTERVENOR  
800 HOYT, LLC**

**CERTIFICATE OF SERVICE**

I, Rachel Friedman, hereby certify that on the December 30, 2021, I caused the within JOINT MOTION TO ATTEND PRETRIAL CONFERENCE VIA REMOTE MEANS AND NELSON DEFENDANTS' MOTION FOR INDEPENDENT APPEARANCE OF FOREIGN ATTORNEY, to be electronically filed and served using the CM/ECF System, which will transmit a Notice of Electronic Filing to counsel of record.

Additionally, the document and notification of filing will be sent by U.S. Mail to the following last-known address of the following parties:

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Stimson Stancil LaBranche Hubbard  
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Dated: December 30, 2021

/s/ Rachel Friedman